

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-SLR
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

AFFIDAVIT OF MICHAEL KNIGHT

I, Michael Knight, having been duly sworn by law, do hereby depose and state as follows:

1. I am employed by the State of Delaware Department of Correction ("DOC") as the Food Services Administrator for all DOC facilities statewide. I have been employed by the DOC since 1986. In 1999, I was promoted to Food Service Manager and in 2000 to Food Service Director. I have been in my present position since 2004.

2. The DOC Kitchen staff investigated the incident described in the Declaration of Inmate Darwin Savage (D.I.272), where a fly was allegedly found in a hotcake prepared in the SCI Kitchen in June 2008. Based upon the first-hand observations on the day in question, the DOC Kitchen Staff determined that the incident was caused by food tampering. Food tampering is the deliberate contamination of food products with the intent to cause harm.

3. The other reported incident from July 2005 (where an inmate claimed he found a parasite in a beef cube steak) was also the result of food tampering.

4. While the SCI Kitchen Staff does its best to supervise inmate kitchen

workers, it cannot prevent all instances of food tampering by the inmate kitchen workers.

5. I have made these statements based upon my personal knowledge, specialized training, and experience as an employee of the Department of Correction.


Michael Knight

SWORN AND SUBSCRIBED before me this 11TH day of July, 2008.


Notary

